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22 NATTO IYELA GBARABE, et al.

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 SAN FRANCISCO DIVISION

17 **NATTO IYELA GBARABE, et al.,**

18 **Case No. 14-cv-00173-SC**

19 **Plaintiffs,**

20 **STIPULATION AND PROPOSED
ORDER RE DISCOVERY DIRECTED
TO NEW PLAINTIFFS IN THE
THIRD AMENDED COMPLAINT**

v.

21 **CHEVRON CORPORATION,**

22 **Defendant.**

23 WHEREAS, defendant served the plaintiffs named in the Second Amended Complaint

24 with one Set of Interrogatories and a First Set of Requests for Production, both dated February 17,

25 2015 and a Second Set of Requests for Production, dated February 27, 2015 (hereafter the

26 "Discovery");

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WHEREAS, the Third Amended Complaint filed on June 1, 2015, among other things, lists 11 additional plaintiffs whom plaintiffs' counsel contend were "drawn from the existing plaintiffs in this case;"

WHEREAS, plaintiffs' counsel offered that they would treat the Discovery as if it were served on those 11 persons on June 1, 2015, without the need for defendant to re-serve the Discovery, and defendant accepted that offer without prejudice to its response to the Third Amended Complaint and without conceding its propriety,

Now, therefore, the parties hereby stipulate as follows:

1. The Discovery identified above shall be deemed served as of June 1, 2015, on the 11 individuals referred to above.

2. This is without prejudice to defendant's rights and remedies with respect to filing of the Third Amended Complaint and without prejudice to plaintiffs' position that the 11 plaintiffs were named pursuant to stipulation dated March 15, 2015.

Pursuant to Local Rule 5-1(i)(3), I, Robert A. Mittelstaedt, attest that concurrence in filing this document has been obtained from the other signatory.

Dated: June 18, 2015

Jones Day

By: /s/ Robert A. Mittelstaedt
Robert A. Mittelstaedt

Counsel for Defendant
CHEVRON CORPORATION

Dated: June 18 2015

Rufus-Isaacs Acland & Grantham LLP

By: /s/ Jacqueline Perry
Jacqueline Perry

Counsel for Plaintiffs
NATTO IYELA GBARABE, et al.

1 [PROPOSED] ORDER
2
3 PURSUANT TO THIS STIPULATION, IT IS SO ORDERED.
4
5 Dated: June 23, 2015
6



The Honorable Samuel Conti

27 NAI-1500377837
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